

# Exhibit A

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

JARROD STRINGER, *et al.*,

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as the  
Texas Secretary of State; STEVEN C. MCCRAW,  
in his official capacity as the Director of the Texas  
Department of Public Safety;

Defendants.

Civ. Action Case No. 5:16-cv-0046-  
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**DECLARATION OF GLEN MAXEY IN SUPPORT OF IN SUPPORT OF  
INTERVENOR-PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO  
DISMISS**

Pursuant to 280 U.S.C. § 1746, I, Glen Maxey, hereby declare as follows:

1. I am over 18 years of age, am competent to testify, and declare the following facts based on my own personal knowledge. I am currently employed by the Texas Democratic Party (“TDP”) as the Primary Director.

2. The TDP is the statewide organization representing Democratic candidates and voters throughout the State of Texas within the meaning of Section 117 of Texas’s Election Code and all other applicable provisions of the election laws.

3. The TDP’s purpose is to elect Democratic Party candidates to public office throughout Texas. To accomplish its purpose, the TDP engages in vitally important activities, including supporting Democratic Party candidates in national, state, and local elections through fundraising and, organizing, and voter registration efforts; protecting the legal rights of voters; and ensuring that all voters have a meaningful ability to cast ballots in Texas. The TDP works closely with Democratic candidates, providing get-out-the-vote (“GOTV”) assistance, and actively

supporting the development of programs benefiting Democratic Party candidates in Texas, including by running what is often referred to as the “coordinated campaign” to boost turnout for voters to support candidates from the top of the ticket, all the way down the Democratic ticket.

4. The TDP has a State Executive Committee of five party officers (Chair, Vice Chair, Vice Chair for Finance, Secretary, and Treasurer), 62 district representatives, 26 representatives of 13 constituency organizations (Texas House Caucus, Texas Senate Caucus, Texas Democratic Veterans, Texas Democratic Women, Texas Asian American Democrats, Hispanic Caucus, Coalition of Black Democrats, Texas Democratic Women, Texas Environmental Democrats, Texas Young Democrats, Texas Democratic County Chairs Association, Democrats with Disabilities, and the Non-Urban and Rural Caucus), and 18 *ex officio* members who represent Texas on the Democratic National Committee. The Party leadership is elected at a biennial state convention by over 10,000 democratically selected delegates who meet in a state convention every even-numbered year.

5. The TDP is composed of county party organizations representing each of the 254 counties of Texas. The county party organizations are governed by an elected county chair and county executive committees composed of precinct-level chairs from each voting precinct in Texas.

6. These county party organizations hold Democratic primary elections in March of even-numbered years to elect Democratic nominees for offices including nominees for U.S. Senate and U.S. House of Representatives, statewide officials (Governor, Lieutenant Governor, Comptroller of Public Account, Attorney General, Land Commissioner, three Railroad Commissioners, and 15 members of the State Board of Education), 31 State Senators and 150 State Representatives, county officials (County Judge, four County Commissioners per county, County

Clerks, District Attorneys, and Tax Assessor/Collectors), and judicial nominees (nine statewide Supreme Court Justices, nine Court of Criminal Appeals judges, 14 Court of Appeals benches of various members, and hundreds of District Judges County Court at Law Judges, Justices of the Peace, and Constables).

7. I have worked for the TDP as a senior advisor to Chairman Gilberto Hinojosa since 2013. Prior to 2013, I served as an employee of the TDP during coordinated campaigns going back to 1982. I was an elected member of the Texas House of Representatives from 1991 to 2002, serving for six terms. I was an unsuccessful candidate for Travis County Tax Assessor Collector in the 2008 Democratic Primary. Since 1970, I have worked as a volunteer, campaign staffer or manager, and party coordinated campaign chair or staff in over 150 campaigns at all levels, from local races to presidential campaigns, all in Texas. I have served as the Legislative Director of the TDP for the past four legislative sessions, specifically drafting and lobbying for passage of several hundred election code bills. My duties in these positions have required me to become knowledgeable about political strategy related to local, state, and federal elections in Texas.

8. Millions of voters participate in our Democratic primary elections and support our Democratic nominees in general elections. Tens of thousands of individual donors support the TDP and our county-level Democratic Party organizations. Under Texas law, a voter who participates in the TDP's March primary affiliates with the Party and is defined as a member of the Party for the voting year. Therefore, the TDP's membership includes millions of Texans each election cycle.

9. I personally interacted with at least one Democratic voter during the 2018 election cycle who had difficulty registering to vote due to Defendants' refusal to allow simultaneous voter registration for individuals who update driver's license information online. The TDP also receives

reports through our voter hotline and from county clerks and election officials of Democratic voters who believe they have registered to vote or updated their voter registration when changing their address online with DPS, who turns out were not in fact get registered due to Defendants' actions.

10. The TDP's millions of members and constituents from across Texas include millions of Texans who affiliate with the Texas Democratic Party by voting in the biennial Democratic Primary, millions of Texans who are drivers who interact with DPS, and many other Texans who regularly support and vote for candidates affiliated with the Democratic Party.

11. The TDP has historically raised and spent hundreds of thousands of dollars, if not millions of dollars, to further its mission in Texas. In 2014, the TDP raised and spent \$1,999,198.27. In 2015, the TDP raised and spent \$226,399.28. In 2016, the TDP raised and spent \$642,522.29. In 2017, the TDP raised and spent 72,494.90. These funds were spent to further efforts to elect democratic candidates to offices throughout Texas.

12. Defendants' conduct directly harms the TDP by imposing burdens and costs that limit the effectiveness of its voter registration program and make it more difficult for the TDP to reach its registration goals and accomplish its mission of electing Democrats in Texas. As a result, the TDP must divert resources to ensuring that eligible voters who may think they are registered due to their interactions with DPS, or who are discouraged from registering, will, in fact, register to vote for the upcoming elections. For example, eligible voters, including Mr. Stringer, often update their addresses, or renew or replace their driver's licenses, through DPS's online portal and believe that DPS is simultaneously transmitting that personal information to the Texas Secretary of State for purposes of voter registration. But the TDP understands that personal information has *not* been simultaneously transmitted to the Texas Secretary of State, and now the TDP must divert

its resources to ensuring that eligible voters are aware of the additional steps they must take to register and must ensure that eligible voters are actually registered to vote.

13. When the TDP diverts resources, it is diverting funds, personnel, and time away from other critical activities in Texas and to the issue of online registration. Specifically, the TDP must reallocate more money, restructure personnel and volunteers, and divert the time of employees and volunteers to voter education and voter registration efforts specifically tied to the issue in this case. But the TDP has finite resources, so the resources diverted to the issue in this case are taken from other activities, such as general GOTV activities and general activities related to educating voters about registration, candidates, and Texas-specific issues.

14. The TDP's registration-focused efforts for 2020 are more robust than any previous efforts—in fact, this is the largest voter registration program in the history of Texas, *see* Exhibit 1—because the TDP has come to understand that Texas's voter registration laws have caused confusion and potential disenfranchisement, especially among Democratic voters. Because of Defendants' actions, the TDP must engage in far greater efforts and spend far more time to ensure that eligible voters understand how to properly register to vote and to ensure that eligible voters become registered to vote. As a result, the TDP has had to divert resources from other mission-critical efforts in order to fund a robust voter registration program. For example, as part of its vigorous registration program, the TDP will put 1,000 field staff and canvassers across the State, mail unregistered eligible voters a voter registration card, chase voter registration forms sent to eligible voters, and work alongside other Democratic organizations to ensure largescale voter registration.

15. The TDP also recently launched a website, [www.registertexas.com](http://www.registertexas.com), which is an online system that allows voters to fill out their voter registration information, including their name

and address. Once voters submit this information, RegisterTexas.com will then mail them a pre-populated voter registration application with the information they have provided and also will include a postage-paid envelope addressed to their county elections office. RegisterTexas.com represents a significant investment of resources for the TDP, and one that would likely be unnecessary if Defendants were complying with federal law.

16. In preparation for the 2020 elections, the TDP has invested significant resources in voter engagement efforts with the goal of registering approximately 2,600,000 unregistered, eligible, Democratic voters. In support of this mission, the TDP initiated a comprehensive organizing campaign that includes sending voter registration forms to new and unregistered Texas residents, following up with residents to encourage the completion and submission of voter registration forms, and partnering with organizations involved in high school and college campus organizing.

17. In addition, the TDP participates in a “coordinated campaign,” in which it works collaboratively with the national Democratic committees, specifically the DSCC and the DCCC, to elect Democrats up and down the ticket within the state. The national parties transfer thousands if not hundreds of thousands of dollars to the TDP in association with this campaign, and those funds are used for a variety of programs, including voter registration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 13, 2020.

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Glen Maxey  
Primary Director  
Texas Democratic Party